UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
ENVIRONMENTAL CLEANUP

January 21, 2014

Mr. Bob Wyatt
NW Natural
220 NW 2nd Avenue
Portland OR 97209

sent via email only

Mr. Myron Burr
Siltronic Corporation
7200 NW Front Avenue, M/S 20
Portland, Oregon 97210-3676

RE: Review of Data Report for EPA-required NW Natural Sediment Characterization Adjacent to U.S. Moorings Site - Addendum 1 to the Project Area Identification Report Quality Assurance Project Plan,
Gasco Sediments Site

Dear Sirs:

The U.S. Environmental Protection Agency (EPA) reviewed the *Data Report for EPA-required NW Natural Sediment Characterization Adjacent to U.S. Moorings Site - Addendum 1 to the Project Area Identification Report Quality Assurance Project Plan* (Data Report), dated December 23, 2013, and prepared by Anchor QEA. This Data Report provides a summary of the sediment characterization investigation conducted offshore of the U.S. Government Moorings (U.S. Moorings) property in late October/early November 2013. The investigation focused on evaluating the presence of substantial product as defined in Section 3.6.2.1 of the Gasco Sediment Site Statement of Work (SOW), Appendix A of the 2009 Gasco Sediments Site Administrative Settlement Agreement and Order on Consent for Removal Action (Consent Order; CERCLA Docket No. 10-2009-0255).

Five cores were collected from the U.S. Moorings offshore area during the investigation at the locations specified in the *Study Design for Sediment Characterization Adjacent to U.S. Moorings Site Required by EPA – Addendum 1 to the Project Area Identification Report Quality Assurance Project Plan* (Work Plan), dated July 18, 2013. A representative from EPA's oversight consultant, CDM Smith, observed the processing of the five cores alongside Anchor QEA staff. CDM Smith's observations agreed with Anchor QEA's assessment that substantial product was not present within the five cores. CDM Smith's observations were compared to the information submitted in the Data Report. EPA has the following comment on the Data Report:

1. Attachment 2: Sediment Core Log 50-BGAQ – Inconsistencies in the description of contamination were noted between Anchor QEA's log and observations from the CDM Smith representative for this core. This comment relates to the modifying factor #3 in the SOW substantial product definition copied here for reference:

If top 5 ft of core has no substantial product under Criteria #1, then deeper product should be judged as "not substantial", even if relatively thick layers of product exist at greater depths.

Criteria #3 is further clarified in the SOW as follows:

Criteria #3 shall consider whether the 5 feet of overlying relatively clean material includes any sediment that would be expected to be removed as part of Army Corps maintenance dredging in the navigation channel. If so, the 5 ft depth requirement should be judged from the depth to which maintenance dredging would occur. The edges of the area with "substantial presence of product" shall be defined by cores which do not contain substantial product.

If dredging occurs at the 50-BGAQ location through remedial actions or other reasons, the depth of any bands or layers of product greater than 2 inches should be evaluated with respect to the new dredge surface. It should be noted that substantial product was not identified at this location by CDM Smith and Anchor QEA based on the assumption that dredging would not occur at this location (the location is situated on the upstream side of the U.S. Moorings dock). As a result, any bands of product, layers of product, "saturated" sediments, "stained" sediments, and/or seams of product greater than 2 inches thick would need to be identified within the upper 5 feet of the core to qualify as substantial product. If mobile non-aqueous phase liquid (NAPL) had been identified within the core, it would have been classified as substantial product regardless of depth; however, mobile NAPL was not identified in Core 50-BGAQ.

No bands greater than 2 inches were identified within the upper 5 feet of Core 50-BGAQ. However, "saturated"/"stained" bands greater than 2 inches in thickness were identified below the upper 5 feet of the core. Inconsistencies were noted between CDM Smith's observations of the depths and thickness of these bands and the Anchor QEA log. These inconsistencies are noted below:

Anchor QEA Log:

8.8-8.9 ft: 1.5 inch black band. Slight HC-like odor. No sheen.
9 ft: 0.25 inch black band. SILT with decomposed organics. Strong HC-like odor. Slight metallic sheen.

CDM Smith observation in this same interval:

8.85-9.05 ft: Dark black band approximately 2.4 inches thick, hydrocarbon odor.

CDM Smith observed one continuous layer at this depth instead of the two separate layers noted in the Anchor QEA log. A photograph showing the black band within the interval in question is attached. The importance of documenting these layers is in case assumptions change about the need for dredging in this area in the future. Should dredging be identified for this area, the 50-BGAQ core log should be reviewed to determine the presence of substantial product with respect to any new dredge surface.

The rest of the core descriptions and discussion of methods utilized were generally consistent with those observed by EPA's oversight representative. Please let me know if you would like to discuss this letter further, or have any questions or concerns at (206) 553-1220 or via email at sheldrake.sean@epa.gov.

Sincerely,

Sean Sheldrake, RPM
Attachment: 50BGAQ photo
Cc:
Kristine Koch, EPA *via email only*
Chip Humphrey, EPA
Mark Ader, EPA
Dana Bayuk, ODEQ


Core 50-BGAQ
5 BG-AQ
DOOLEYBOARDS
Black band at
8.85-9.05 ft